

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

- - -

CARMEN RILEY, Administrator: CIVIL ACTION
of the Estate for Tyrique : NO. 4:20-CV-00325
Riley, et al. :

Plaintiffs, :

V. :

BRIAN CLARK, Warden of :
Dauphin County Prison, et :
al. :

Defendants. :

- - -

Thursday, July 7, 2022

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Oral deposition of KASSANDRA BETANCOURT,
taken via Zoom Video Communications on the
above date, beginning at approximately 9:30
a.m., before Maria Rousakis, Professional
Court Reporter and Notary Public.

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KASSANDRA BETANCOURT

2 (Pages 2 to 5)

<div>Page 2</div> <div>APPEARANCES: MINCEY FITZPATRICK ROSS, LLC BY: KEVIN V. MINCEY, ESQUIRE RILEY H. ROSS, ESQUIRE One Liberty Place 1650 Market Street Suite 3600 Philadelphia, Pennsylvania 19103 Counsel for Plaintiffs MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN BY: JOHN R. NINOSKY, ESQUIRE 100 Corporate Center Drive Suite 201 Camp Hill, Pennsylvania 17011 Counsel for Defendant, Prime Care and Ms. Betancourt LAVERY LAW BY: FRANK LAVERY, ESQUIRE 225 Market Street P.O. Box 1245 Harrisburg, Pennsylvania 17108 Counsel for Defendant, Lt. Greg Mendenhall MARSHALL DENNEHEY BY: ALISSA CARDENAS HARRISON, ESQUIRE 100 Corporate Drive Suite 201 Camp Hill, Pennsylvania 17011 Counsel for Defendant, Angela Swanson</div>	<div>Page 4</div> <div>INDEX TO TESTIMONY WITNESSPAGE KASSANDRA BETANCOURT Examined By Mr. Mincey:5 Mr. Polaha:80 --- (No exhibits were marked at this time.) ---</div>
<div>Page 3</div> <div>APPEARANCES: (Cont'd.) MacMAIN, CONNELL & LEINHAUSER BY: MATTHEW S. POLAHA, ESQUIRE 433 West Market Street Suite 200 West Chester, Pennsylvania 19382 Counsel for Susquehanna Defendants ---</div>	<div>Page 5</div> <div>1 (It was stipulated by and 2 between counsel for the 3 respective parties that reading, 4 signing, sealing, certification 5 and filing are not waived, and 6 that all objections, except as to 7 the form of the question, are 8 reserved to the time of trial.) 9 --- 10 KASSANDRA BETANCOURT, 11 having been first duly sworn as a 12 witness, was examined and 13 testified as follows 14 --- 15 EXAMINATION 16 --- 17 BY MR. MINCEY: 18 Q. Good morning, Ms. Betancourt. My 19 name is Kevin Mincey. I am here with my 20 partner, Riley Ross. We represent the 21 Estate of Tyrique Riley along with Mr. 22 Riley's parents in a lawsuit filed 23 against a number of Defendants including 24 Prime Care, and today is your 25 deposition.</div>

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3 (Pages 6 to 9)

<p style="text-align: right;">Page 6</p> <p>1 Have you ever been deposed before?</p> <p>2 A. No.</p> <p>3 Q. Okay. I'm going to give you some</p> <p>4 ground rules to try to make this as easy</p> <p>5 as possible for us. Okay? I'm sure</p> <p>6 some of it you've probably gone over</p> <p>7 with your counsel, but allow me to be a</p> <p>8 little bit repetitive if you may.</p> <p>9 This is a question and answer</p> <p>10 session, so there are no right and wrong</p> <p>11 answers. It's just an opportunity for</p> <p>12 me to ask you questions, and for the</p> <p>13 other counsel on the call to ask you</p> <p>14 questions and get some more information</p> <p>15 about Mr. Riley's medical treatment.</p> <p>16 I want your best recollection of</p> <p>17 the event. I don't want you to guess,</p> <p>18 okay. If you're going to approximate</p> <p>19 something like a length of time or a</p> <p>20 distance or something like that, just</p> <p>21 let me know that you're approximating so</p> <p>22 the record can accurately reflect that.</p> <p>23 Okay?</p> <p>24 A. Okay.</p> <p>25 Q. I need you to give me all verbal</p>	<p style="text-align: right;">Page 8</p> <p>1 normal and okay for us to kind of cut</p> <p>2 each other off and start to answer</p> <p>3 before I finish asking the questions,</p> <p>4 but, again, because we're having this</p> <p>5 transcribed, a written copy produced,</p> <p>6 I'm going to ask that you don't do that</p> <p>7 even if you can guess what I'm about to</p> <p>8 ask. Okay?</p> <p>9 To the best that you can, please</p> <p>10 allow me to finish asking the question</p> <p>11 before you answer, and I'll do my best</p> <p>12 to let you finish answering the</p> <p>13 question before I ask my next question.</p> <p>14 Okay?</p> <p>15 A. Okay.</p> <p>16 Q. If you don't understand a question</p> <p>17 that I ask, please let me know.</p> <p>18 Sometimes lawyers tend to talk in</p> <p>19 attorney terms that aren't for normal</p> <p>20 people, and we assume that everybody</p> <p>21 understands what we're talking about.</p> <p>22 So, if I do that, please let know, and</p> <p>23 I'll do my best to rephrase any question</p> <p>24 that is confusing.</p> <p>25 If you do not stop me or you answer</p>
<p style="text-align: right;">Page 7</p> <p>1 responses to all of my questions. In a</p> <p>2 normal conversation, we could be talking</p> <p>3 to each other, and I could tell by your</p> <p>4 facial expression and nodding your head,</p> <p>5 shaking your head, what you mean and</p> <p>6 kind of what your intent is. But that</p> <p>7 doesn't come across in a written</p> <p>8 transcript that's being provided to us</p> <p>9 by the court reporter, so it's really</p> <p>10 important that I get verbal responses.</p> <p>11 Okay?</p> <p>12 A. Okay.</p> <p>13 Q. To the best that you can, I'm going</p> <p>14 to ask that you give me "yes" or "no"</p> <p>15 answers to the questions. Obviously you</p> <p>16 may need to elaborate on your yes or nos</p> <p>17 and give explanations, but as long as</p> <p>18 you don't give me "uh-uh" or "uh-huh,"</p> <p>19 we should be good. Okay?</p> <p>20 A. Okay.</p> <p>21 Q. Also, in the course of a</p> <p>22 conversation, you might be able to</p> <p>23 anticipate what I'm about to say or what</p> <p>24 I'm about to ask you. If we were just</p> <p>25 talking on the street, it would be</p>	<p style="text-align: right;">Page 9</p> <p>1 a question that I ask, I'm going to</p> <p>2 assume that you understood the question.</p> <p>3 Do you understand that?</p> <p>4 A. Okay.</p> <p>5 Q. I'm hoping that this won't be a</p> <p>6 really long time, Ms. Betancourt, but to</p> <p>7 the extent while we're in this</p> <p>8 deposition you need to take a break to</p> <p>9 use the restroom or to ask a question of</p> <p>10 counsel, you're certainly permitted to</p> <p>11 do that. The only rule, I guess, is</p> <p>12 that if there's been a question asked,</p> <p>13 I'm going to ask for you to answer the</p> <p>14 question before we take that break.</p> <p>15 Okay?</p> <p>16 A. Okay.</p> <p>17 Q. All right. Do you understand all</p> <p>18 the ground rules that I kind of laid out</p> <p>19 so far?</p> <p>20 A. Yes.</p> <p>21 Q. Have you taken any medication this</p> <p>22 morning that would influence your</p> <p>23 ability to hear and understand my</p> <p>24 questions, and to give truthful answers</p> <p>25 to those questions?</p>

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4 (Pages 10 to 13)

<p style="text-align: right;">Page 10</p> <p>1 A. No.</p> <p>2 Q. Do you understand that the oath</p> <p>3 you just took a couple minutes ago is</p> <p>4 the same oath you would take if we were</p> <p>5 in a courtroom in front of a judge or a</p> <p>6 jury?</p> <p>7 A. Yes.</p> <p>8 Q. And is there any reason right now</p> <p>9 that you're not prepared to go forward</p> <p>10 with your deposition testimony at this</p> <p>11 time?</p> <p>12 A. No.</p> <p>13 Q. And in preparation for your</p> <p>14 deposition today, did you review any</p> <p>15 documents?</p> <p>16 A. No.</p> <p>17 Q. Okay. I'm going to start with some</p> <p>18 background information. Ms. Betancourt,</p> <p>19 can you give them your full name?</p> <p>20 A. Kassandra Betancourt.</p> <p>21 Q. Do you have a middle name?</p> <p>22 A. No.</p> <p>23 Q. What's your date of birth?</p> <p>24 A. 12/4/87.</p> <p>25 Q. Graduated from high school?</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. What kind of degree or</p> <p>2 certification did you graduate with?</p> <p>3 A. I have an Associate's Degree in</p> <p>4 medical assistant.</p> <p>5 Q. What is your current address?</p> <p>6 MR. NINOSKY: Kevin, I'm</p> <p>7 going to not have her give it to</p> <p>8 you. You know, she currently</p> <p>9 works as a corrections officer</p> <p>10 over in Cumberland County, so if</p> <p>11 at some point I cannot produce</p> <p>12 her, I will give you the last</p> <p>13 known address. But at this</p> <p>14 point, you contact her through</p> <p>15 me.</p> <p>16 MR. MINCEY: Okay. That's</p> <p>17 fair.</p> <p>18 MR. NINOSKY: Thank you for</p> <p>19 that courtesy.</p> <p>20 MR. MINCEY: Yup.</p> <p>21 BY MR. MINCEY:</p> <p>22 Q. Ms. Betancourt, does anybody live</p> <p>23 with you?</p> <p>24 A. My children.</p> <p>25 Q. Okay. How many kids do you have?</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Yes.</p> <p>2 Q. What high school?</p> <p>3 A. Red Land.</p> <p>4 Q. Spell that for me?</p> <p>5 A. Red Land Senior High School. It's</p> <p>6 in Etters, PA.</p> <p>7 Q. Etters, PA?</p> <p>8 A. Or Lewisberry. Lewisberry, PA.</p> <p>9 Q. Lewisberry?</p> <p>10 A. Yes.</p> <p>11 Q. What year did you graduate?</p> <p>12 A. 2005.</p> <p>13 Q. After you graduated from high</p> <p>14 school, did you go to college?</p> <p>15 A. I went to YTI.</p> <p>16 Q. What's that stand for?</p> <p>17 A. York Technical Institute.</p> <p>18 Q. And when did you enroll at York</p> <p>19 Technical Institute?</p> <p>20 A. 2005.</p> <p>21 Q. Did you graduate from York</p> <p>22 Technical Institute?</p> <p>23 A. Yes.</p> <p>24 Q. And what year did you graduate?</p> <p>25 A. 2007.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. Two.</p> <p>2 Q. How old are they?</p> <p>3 A. 14 and 4.</p> <p>4 Q. Have you ever been arrested before,</p> <p>5 Ms. Betancourt?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. How many times have you been</p> <p>8 arrested?</p> <p>9 A. I'm going to say maybe two. Two.</p> <p>10 Q. When was the first time you were</p> <p>11 arrested?</p> <p>12 A. Years ago when I was a teenager.</p> <p>13 Years ago.</p> <p>14 Q. How old were you? Do you remember</p> <p>15 how old you are?</p> <p>16 A. I'm going to say maybe like 19.</p> <p>17 Q. Do you remember what you were</p> <p>18 arrested for?</p> <p>19 A. Yeah. It was -- I had a warrant</p> <p>20 for a fine that I didn't pay, fines and</p> <p>21 costs.</p> <p>22 Q. What was the fine for?</p> <p>23 A. It was for a traffic violation.</p> <p>24 Both of the situations was for a traffic</p> <p>25 violation. Fines and costs.</p>

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<p style="text-align: right;">Page 14</p> <p>1 Q. Okay. And was the traffic 2 violation in Pennsylvania somewhere? 3 A. Yes. York, Pennsylvania. 4 Q. And you said they were both traffic 5 incidents. When was the last time you 6 were arrested? Do you remember how old 7 you were? 8 A. I'm going to say maybe like 24, 25, 9 around there. Same thing, fines and 10 costs, I think. And, actually, I'm 11 going to take that back. It was for a 12 school fine the second time around. 13 Q. It was for a school fine? 14 A. For my child that I didn't pay. 15 Q. I'm confused now, so forgive my 16 ignorance. What's a school fine? 17 A. Like, if they don't go to school. 18 Q. Oh. Truancy? 19 A. Yes. That's what it was. 20 Q. And that was by the York School 21 District? 22 A. West York, yup. 23 Q. And that was the second time you 24 were arrested? 25 A. That was the second time.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. And what are your duties as a 2 corrections officer for Cumberland 3 County Prison? 4 A. Security. 5 Q. Just general security? Do you work 6 on the block? 7 A. Yes, I work on the block. I work 8 on female blocks. I work medical. 9 Wherever they assign my post when I come 10 in is where I go. 11 Q. And how long have you been a nurse 12 manager? 13 A. A year. 14 Q. And what are your duties as the 15 nurse manager? 16 A. I do payroll. I make sure I do 17 staffing for my nursing, make sure 18 everything clinical-wise is being 19 handled the way it should be. I order 20 supplies like vaccines, office supplies, 21 anything that's needed medically. 22 Answer phone calls, messages, things 23 like that. 24 Q. And when you say you started as 25 nurse manager a year ago, so we're</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Do you remember approximately what 2 the fine was, the dollar amount? 3 A. I think it was like \$98. I didn't 4 even know I had it because I had moved. 5 I mean, I got out right away. Paid it. 6 Q. Those were the only two times you 7 were arrested? 8 A. Correct. 9 Q. Have you ever been a party to a 10 lawsuit before? 11 A. No. 12 Q. What is your current job? 13 A. Corrections officer at Cumberland 14 County Prison. I'm also a nurse manager 15 at Diamond Tony & Associates Family 16 Medicine. 17 Q. You said you're a medical manager? 18 A. A nurse manager for the office. 19 Q. How long have you been a 20 corrections officer at Cumberland County 21 Prison? 22 A. I just started May 9th of this 23 year. 24 Q. Congrats on the new job. 25 A. Thank you.</p>	<p style="text-align: right;">Page 17</p> <p>1 talking -- 2 A. 2021. 3 Q. Okay. Do you remember what time of 4 year; spring, winter? 5 A. It was in the summer. It was the 6 end of June, so it just actually came up 7 a year. 8 Q. Prior to your job as a nurse 9 manager, did you have any other type of 10 employment? 11 A. I worked at Dauphin County Prison 12 as a medical assistant. 13 Q. And when did you start work at 14 Dauphin County Prison? 15 A. April of 2019. 16 Q. And what were your duties as a 17 medical assistant at Dauphin County 18 Prison? 19 A. Intakes, vitals, blood work, 20 respond to medical emergencies, EKG, 21 any, like, dressing changes. Anything 22 clinical. The only thing I didn't do 23 was pass meds. 24 Q. When you say "pass meds," you mean 25 like deliver them to the inmates?</p>

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<p>1 A. Correct.</p> <p>2 Q. When did you stop working at</p> <p>3 Dauphin County Prison?</p> <p>4 A. The beginning of June of 2021.</p> <p>5 Q. Is there any particular reason why</p> <p>6 you left your job at Dauphin County</p> <p>7 Prison?</p> <p>8 A. I had a situation where I was</p> <p>9 threatened by an inmate. My life was</p> <p>10 threatened.</p> <p>11 Q. And do you remember when your life</p> <p>12 was threatened by the inmate at Dauphin</p> <p>13 County Prison?</p> <p>14 A. I'm going to say the last maybe</p> <p>15 two weeks of May, yeah.</p> <p>16 Q. And that's of 2021?</p> <p>17 A. 2021.</p> <p>18 Q. And was that the first time you had</p> <p>19 been threatened by an inmate?</p> <p>20 A. Not as serious as that, yes.</p> <p>21 Q. What was it about this particular</p> <p>22 threat in May of 2021 that made you</p> <p>23 decide to get a new job?</p> <p>24 A. This inmate knew my car, knew</p> <p>25 exactly my work schedule, and pretty</p>	<p>1 taking you back to June 18th of 2019.</p> <p>2 Am I correct that you were still working</p> <p>3 as a medical assistant at that time for</p> <p>4 Dauphin County Prison?</p> <p>5 A. Yes.</p> <p>6 Q. And when you are working intake,</p> <p>7 does that happen in a particular part of</p> <p>8 the prison?</p> <p>9 A. It can happen in two parts of the</p> <p>10 prison. So, it can happen at the</p> <p>11 Judicial Center if they're being brought</p> <p>12 in by the police, or it can happen up in</p> <p>13 the actual prison in a medical office if</p> <p>14 they're being brought in by, like, state</p> <p>15 marshals, Feds.</p> <p>16 Q. Do you recall performing the intake</p> <p>17 on Tyrique Riley when he was brought</p> <p>18 into the prison on June 18th, 2019?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recall what part the prison</p> <p>21 that intake was performed in?</p> <p>22 A. Judicial Center.</p> <p>23 Q. And when you are performing your</p> <p>24 intake, are there any written rules or</p> <p>25 policies that you are to follow in</p>
Page 19	Page 21
<p>1 much just said that they were going to</p> <p>2 have people outside waiting to stab me</p> <p>3 up.</p> <p>4 Q. Did you receive or have you</p> <p>5 received any special certifications to</p> <p>6 work inside of the prison as a medical</p> <p>7 assistant?</p> <p>8 A. I mean, I just needed my degree, my</p> <p>9 college degree.</p> <p>10 Q. While you were working for Dauphin</p> <p>11 County Prison, were there any type of</p> <p>12 additional trainings as you went through</p> <p>13 that, produce some type of additional</p> <p>14 certificate?</p> <p>15 A. No. Just like CPR</p> <p>16 recertifications, stuff like that.</p> <p>17 Q. And the CPR recertification, that's</p> <p>18 something that would happen yearly?</p> <p>19 A. Every two years.</p> <p>20 Q. Were you ever -- did you ever</p> <p>21 receive any discipline for your work as</p> <p>22 a medical assistant while you worked at</p> <p>23 Dauphin County Prison?</p> <p>24 A. No.</p> <p>25 Q. All right. Ms. Betancourt, I'm</p>	<p>1 performing the intake procedure?</p> <p>2 MR. NINOSKY: Object to the</p> <p>3 form.</p> <p>4 You can answer.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. MINCEY:</p> <p>7 Q. And what rules are you supposed to</p> <p>8 follow?</p> <p>9 MR. NINOSKY: Object to the</p> <p>10 form.</p> <p>11 You can answer.</p> <p>12 THE WITNESS: So, we have</p> <p>13 protocols we have to follow.</p> <p>14 Basically it's based off of the</p> <p>15 detainee, how they're -- like, if</p> <p>16 they're on drugs, if they're able</p> <p>17 to respond to us. It's just</p> <p>18 certain different things that we</p> <p>19 have to...</p> <p>20 MR. NINOSKY: That's okay.</p> <p>21 Do the best that you can.</p> <p>22 THE WITNESS: Certain</p> <p>23 protocols we have to follow.</p> <p>24 It's hard for me to explain, but</p> <p>25 if someone's coming in, you know,</p>

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<p style="text-align: right;">Page 22</p> <p>1 drunk, we know there's different 2 protocols we have to follow. If 3 someone's coming in, a regular 4 normal person, we just do regular 5 normal intake. It's just 6 different ways we base it off of. 7 BY MR. MINCEY: 8 Q. Are those protocols in writing 9 somewhere? 10 A. They're policies. 11 Q. Are those in writing? 12 A. Yes. 13 Q. Okay. And where would someone find 14 those policies in writing? 15 A. In the HSA office, any Prime Care 16 managers or... 17 Q. Were you done with your answer? 18 I'm sorry. 19 A. Yes. 20 Q. All right. And those written 21 policies, are those something that 22 each -- I won't say each. Are those 23 something that you received your own 24 copy of while you were working as a 25 medical assistant?</p>	<p style="text-align: right;">Page 24</p> <p>1 A. It's in the binder, but that policy 2 is also hanging up in the Judicial 3 Center in the medical room as well. 4 Q. And what is that policy; do you 5 know? 6 A. I don't remember offhand, but I do 7 know that if -- I do know we based it 8 off of -- like, if they're coming in and 9 someone is intoxicated where they can't 10 stand, stumbling, those type of 11 situations would be where we would send 12 them to the hospital. 13 Q. I'm understanding your answer to be 14 that unless a person -- if a person is 15 intoxicated, they might go to the 16 hospital, but if they're not 17 intoxicated, they don't? 18 MR. NINOSKY: Object to the 19 form. 20 You can answer. 21 THE WITNESS: No. If a 22 person is severely intoxicated to 23 the point they cannot stand on 24 their two feet, then that's when 25 we will send them to the</p>
<p style="text-align: right;">Page 23</p> <p>1 A. No. I got them when I got hired 2 and I did my training. I went over 3 those policies with the actual HSA. 4 Q. But you were not provided your own 5 copy to keep and review on your own 6 time? 7 A. No, I was not provided with it, but 8 there's a binder that we have access to. 9 We can pull it out whenever. 10 Q. And where do they keep that 11 binder? 12 A. In the medical office. 13 Q. Is there a written policy for when 14 it is appropriate to send an inmate, I 15 guess for lack of a better term, or 16 arrestee to the hospital instead of 17 allowing them to remain in jail? 18 MR. NINOSKY: Object to the 19 form. 20 But you can answer. 21 THE WITNESS: Yes. Yes, 22 there is. 23 BY MR. MINCEY: 24 Q. And what is -- well, let me ask you 25 this: Is that policy in that binder?</p>	<p style="text-align: right;">Page 25</p> <p>1 hospital. 2 BY MR. MINCEY: 3 Q. What about if a person is suffering 4 from some type of medical condition or 5 injury, is there a policy that allows 6 for that inmate to be sent to the 7 hospital versus staying at the prison? 8 MR. NINOSKY: Object to the 9 form. 10 But you can answer. 11 THE WITNESS: Yes. If they 12 have a specific injury that they 13 sustain prior to coming to the 14 prison, they are able to go to 15 the hospital, but it's based off 16 of -- I don't make that decision. 17 It's based off of the charge 18 nurse. 19 BY MR. MINCEY: 20 Q. That was going to be my next 21 question. So, if you make that type of 22 observation, that someone has a 23 qualifying injury we'll call it, who do 24 you report that to? 25 MR. NINOSKY: Object to the</p>

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8 (Pages 26 to 29)

<p style="text-align: right;">Page 26</p> <p>1 form.</p> <p>2 You can answer.</p> <p>3 THE WITNESS: Charge nurse.</p> <p>4 BY MR. MINCEY:</p> <p>5 Q. Is there more than one charge nurse</p> <p>6 at this time, June 18th, 2019? Was</p> <p>7 there more than one nurse at Dauphin</p> <p>8 County Prison?</p> <p>9 A. No. It's one charge nurse a</p> <p>10 shift.</p> <p>11 Q. And do you recall who the charge</p> <p>12 nurse was on your shift back on</p> <p>13 June 18th, 2019?</p> <p>14 A. I do not.</p> <p>15 Q. In your time performing intakes at</p> <p>16 Dauphin County Prison, has there been an</p> <p>17 occasion where you noticed someone with</p> <p>18 an injury, and you recommended to the</p> <p>19 charge nurse that that person go to the</p> <p>20 hospital?</p> <p>21 A. Yes.</p> <p>22 Q. Can you give me an approximation of</p> <p>23 how many times that has happened?</p> <p>24 A. I'm going to say maybe ten.</p> <p>25 Q. And this incident, at least, began</p>	<p style="text-align: right;">Page 28</p> <p>1 could be four.</p> <p>2 Q. Is four the most, the highest</p> <p>3 number of medical assistants, that you</p> <p>4 worked with on a shift at Dauphin County</p> <p>5 Prison? I'm asking you that as far as</p> <p>6 your entire time working there.</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And two is the fewest?</p> <p>9 A. Well, one. There were times I was</p> <p>10 by myself.</p> <p>11 Q. On June 18th, 2019, were you</p> <p>12 working by yourself, or were you working</p> <p>13 with other medical assistants?</p> <p>14 A. I don't remember.</p> <p>15 Q. Now, you said you first came into</p> <p>16 contact with Mr. Riley at the Judicial</p> <p>17 Center?</p> <p>18 A. Yes.</p> <p>19 MR. LAVERY: Kevin?</p> <p>20 MR. MINCEY: Yes.</p> <p>21 MR. LAVERY: I'm sorry to</p> <p>22 interrupt you. One thing I</p> <p>23 should have mentioned at the</p> <p>24 beginning of the deposition, if</p> <p>25 there's an objection made by one</p>
<p style="text-align: right;">Page 27</p> <p>1 on June 18th, 2019, so that was</p> <p>2 approximately two months after you</p> <p>3 started at Dauphin County Prison; is</p> <p>4 that correct?</p> <p>5 A. Correct.</p> <p>6 Q. And in the two months that you had</p> <p>7 worked, from April 2019 to June of 2019,</p> <p>8 had you had the opportunity to</p> <p>9 recommend to the charge nurse that</p> <p>10 somebody go to the hospital for a</p> <p>11 sustained injury?</p> <p>12 A. I don't remember.</p> <p>13 Q. When you're on shift, how many</p> <p>14 other medical assistants are working</p> <p>15 with you?</p> <p>16 MR. NINOSKY: Is everything</p> <p>17 focused in the June 2019</p> <p>18 timeframe?</p> <p>19 MR. MINCEY: My bad. That</p> <p>20 was a bad question, John. Yes.</p> <p>21 BY MR. MINCEY:</p> <p>22 Q. Back on June 18th, 2019, how many</p> <p>23 medical assistants were working with you</p> <p>24 on your shift?</p> <p>25 A. Some days could be two, some days</p>	<p style="text-align: right;">Page 29</p> <p>1 counsel to form, will that cover</p> <p>2 all counsel, so I don't have to</p> <p>3 jump in every time John makes his</p> <p>4 objections?</p> <p>5 MR. MINCEY: Yeah. I have</p> <p>6 no problem with that.</p> <p>7 MR. LAVERY: Sorry. My</p> <p>8 bad. I won't interrupt you</p> <p>9 again.</p> <p>10 MR. MINCEY: No. You're</p> <p>11 good.</p> <p>12 BY MR. MINCEY:</p> <p>13 Q. Ms. Betancourt, was there a</p> <p>14 particular room that your first contact</p> <p>15 with Mr. Riley occurred in?</p> <p>16 A. The medical office.</p> <p>17 Q. And when a person -- when people</p> <p>18 are first brought into the Judicial</p> <p>19 Center, before they get to the medical</p> <p>20 office, are they held in a particular</p> <p>21 area?</p> <p>22 A. Well, they could be held in cells,</p> <p>23 they have cells there, or they could be</p> <p>24 sitting on a bench depending on if</p> <p>25 they're being processed or not.</p>

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9 (Pages 30 to 33)

Page 30	Page 32
<p>1 Q. Do you recall where Mr. Riley came 2 from when he came to the medical office? 3 A. I do not. 4 Q. And when Mr. Riley comes to the 5 medical office, is he escorted by 6 somebody? 7 A. He's escorted by officers. 8 Q. Do you recall who escorted Mr. 9 Riley to the medical office? 10 A. I do not. 11 Q. What is the first thing that you do 12 when an inmate comes into the medical 13 office for intake? 14 A. I do their vitals first, check 15 their blood sugars and place a PPD. 16 Q. And what's a PPD. 17 A. A tuberculosis test. 18 Q. After you do the vitals, what's the 19 next thing that you do? 20 A. I would ask questions. 21 Q. What type of questions? 22 A. The medical questions that is on 23 the screen that we are to ask. 24 Q. So, are you working off of a form 25 or a script when you're doing intake for</p>	<p>1 Ms. Betancourt, I'm trying to share 2 my screen. Can you see my screen? 3 A. Yes. 4 Q. These are part of a series of 5 documents that were provided to us by 6 Prime Care. There are little numbers. 7 I don't know if you have a paper copy in 8 front of you of the documents. 9 MR. NINOSKY: I can give 10 her a paper copy, Kevin, if you 11 think that's easier. 12 MR. MINCEY: Honestly, it's 13 a preference for you guys. I'll 14 take my time on the screen and 15 make sure she can see everything 16 I'm going to ask her about. 17 MR. NINOSKY: Fair enough. 18 MR. MINCEY: And there are 19 bate stamps on the bottom of the 20 page, so I will refer to the bate 21 stamps for the record so we can 22 make clear what we're referring 23 to. Okay? 24 MR. NINOSKY: Okay. As far 25 as I'm concerned, they don't need</p>
Page 31	Page 33
<p>1 people that come into the medical 2 office? 3 A. Yes. 4 Q. And that script is on a computer 5 screen? 6 A. Yes. 7 Q. And are you typing answers into the 8 computer, or is there like a dropdown 9 menu? 10 A. We type answers and we also click. 11 Q. Okay. When you say you "click," 12 you're clicking "yes" or "no?" 13 A. Correct. 14 Q. Or whatever the answers are? 15 A. Right. 16 Q. Okay. And are you make notes of 17 your observations anywhere else outside 18 of the computer screen that you're 19 working off of? 20 A. There was an intake form that we 21 write our vitals on. 22 Q. Is that the only other place you 23 would take notes? 24 A. Right. 25 Q. Let's see if I can do this right.</p>	<p>1 to be marked again because of the 2 bate stamping, as long as we keep 3 referring to those. 4 MR. MINCEY: Okay. Sounds 5 good. 6 BY MR. MINCEY: 7 Q. Ms. Betancourt, I am showing you 8 what has been bate stamped as PCM15. Do 9 you recognize this form? 10 A. Yes. 11 Q. Okay. I know it says at the top 12 Influenza and Exit Control Surveillance. 13 Is this one of the scripted forms that 14 you would complete in intake in the 15 medical office? 16 A. Yes. 17 Q. And I'm highlighting at the top of 18 the page. It has Interviewer, and it 19 says "MA Betancourt." Is that you? 20 A. Yes. 21 Q. And it says "10:06." Does that 22 mean 10:06 in the morning or evening? 23 A. The morning. 24 Q. Does Dauphin County Prison use a 25 24-hour system for their time?</p>

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10 (Pages 34 to 37)

<p style="text-align: right;">Page 34</p> <p>1 A. Yes. 2 Q. Okay. And, then, it looks like -- 3 and correct me if I'm wrong, but it 4 looks like you are filling in or 5 clicking information as you're 6 collecting it from Mr. Riley? 7 A. Correct. 8 Q. So, did you take his temperature? 9 A. Yes. 10 Q. And then that's reflected here 11 where it says "97.5," right? 12 A. Yes. 13 Q. Box Number 4, it says, "Level of 14 awareness," and you clicked "confused." 15 Do you see that? 16 A. Mm-hmm. 17 Q. Can you describe for me what led 18 you to check the box "confused?" 19 A. He was -- he was confused. He 20 wasn't -- I mean, he was just repeating 21 words, specific words, and he was just 22 saying, "Bro." 23 Q. I'm sorry. He was just saying 24 what? 25 A. The word "bro." He was just</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Do you recall him saying anything 2 else? 3 A. No. 4 Q. When he was saying that he didn't 5 do it, was that in response to any 6 particular question that you asked? 7 A. No. He just kept repeating, "Bro, 8 I didn't do it." 9 Q. The next box says that he is 10 "oriented to," and you checked "person, 11 place and time." How did you make the 12 determination that Mr. Riley was 13 oriented to person, place and time? 14 A. I don't know. 15 Q. Are there specific questions that 16 you asked to make that determination in 17 your interview? 18 A. I can't remember. 19 Q. Have there been occasions where you 20 evaluated somebody, and you decide that 21 they weren't oriented to person, place 22 and time? 23 A. I can't even remember. 24 Q. How do you determine that a person 25 is oriented to where they are?</p>
<p style="text-align: right;">Page 35</p> <p>1 confused. He appeared to be confused. 2 Q. Was he able to answer your 3 questions? 4 A. He was shaking his head. The first 5 few questions I asked him, he shook his 6 head, too, but then I started to notice 7 that he wasn't all the way there, so 8 that's when I stopped. 9 Q. Do you remember what the first 10 question that you asked him was? 11 A. The questions on that page. 12 Q. Okay. So, you asked him if he had 13 any of the following symptoms, and then 14 you listed them for him? 15 A. Yes. I don't remember. 16 Q. Okay. 17 A. I don't remember. 18 Q. But am I correct in understanding 19 that to the best of your recollection, 20 you went down this page in order? 21 A. Correct. 22 Q. Other than repeating the word "bro" 23 over and over, was he saying -- was Mr. 24 Riley saying anything else? 25 A. Yeah. He said he didn't do it.</p>	<p style="text-align: right;">Page 37</p> <p>1 A. I would talk to them. Just based 2 off of the conversations I have or how 3 they're acting. 4 Q. Do you remember what you were 5 talking to Mr. Riley about that led you 6 to believe that he was oriented to where 7 he was? 8 A. 'Cause I was asking him questions, 9 and he was going like this (indicating a 10 nod), so at that time, that's what I 11 thought. 12 Q. Do you recall what questions you 13 were asking him where he was nodding his 14 head? 15 A. The questions that are on that 16 form, 1, 2, 3, 4. 17 Q. Okay. So, what about the first 18 three questions on this form would lead 19 to you believe that he was oriented to 20 where he was? 21 MR. NINOSKY: Object to the 22 form. 23 You can answer his question 24 if you understand it. 25 THE WITNESS: I don't.</p>

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11 (Pages 38 to 41)

<p style="text-align: right;">Page 38</p> <p>1 BY MR. MINCEY: 2 Q. You don't understand the question? 3 A. No. 4 Q. Okay. Is there something in 5 particular about the answers that Mr. 6 Riley gave you to Questions 1, 2 and 3 7 that led you to believe he was oriented 8 to the fact that he was inside a 9 prison? 10 A. When I asked the questions, he 11 didn't have any of the following 12 symptoms, cough, chest pain, diarrhea, 13 sore throat and blah-blah-blah. He 14 shook his head no, so to me, I took 15 that as he understood what I was 16 saying. 17 Q. Did you ask him any specific 18 questions to determine who he was? 19 A. No. I don't go into details with 20 detainees. I go in there, I ask the 21 questions that I'm supposed to ask, and 22 I leave. 23 Q. So, did you ask him what his name 24 was? 25 A. No. I knew his name.</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. Do you recall or do you know what 2 time Mr. Riley got to Dauphin County 3 Prison on June 18th -- 4 A. I don't. 5 I'm sorry. I don't know. 6 Q. Okay. And it says right here, 7 "Restrict from unit, cleared by 8 psychologist, psychiatrist." Both of 9 these boxes are checked. Did you check 10 these boxes? 11 A. Yes. 12 MR. NINOSKY: It says, 13 "Restrict from until cleared by." 14 MR. MINCEY: Oh, "until." 15 I'm sorry. Thank you. 16 BY MR. MINCEY: 17 Q. "Until cleared by psychologist, 18 psychiatrist," you checked these boxes? 19 A. Yes, I did. 20 Q. Okay. And what caused you to check 21 those two boxes? 22 A. When I couldn't complete the 23 intake. If you can't complete an 24 intake, they are automatically placed on 25 a Level 1. So, I could not complete his</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. Did you ask him -- in order to find 2 out if he knew who he was, did you ask 3 him what his name was? 4 A. I don't remember. 5 Q. Did you ask him questions about 6 what time it was or what year it was to 7 determine whether or not he knew he was 8 oriented to the time? 9 A. I don't remember. 10 Q. Let me move to another page, Ms. 11 Betancourt. 12 Ms. Betancourt, I am showing you a 13 page marked PCM31. Do you recognize 14 this form? 15 A. Yes. 16 Q. Is this another one of the forms 17 that you would fill out in the medical 18 office at the Judicial Center? 19 A. Yes. 20 Q. And I'm highlighting up here. 21 Looks like your name? 22 A. Yes. 23 Q. And that says "10:28" in the 24 morning? 25 A. Yes.</p>	<p style="text-align: right;">Page 41</p> <p>1 intake, so I had to automatically place 2 him as a Level 1. 3 Q. When you automatically place 4 somebody on Level 1, is it possible that 5 you could observe things that make you 6 place him at the higher level, constant 7 observations; is that possible? 8 A. I don't do constant observations. 9 That would be a psychologist or 10 psychiatrist. I only can place a 11 Level 1 or Level 2. 12 Q. Okay. And just so we're clear, 13 Level 1 is suicide watch for 10 minutes, 14 correct? 15 A. Correct. 16 Q. And once you initiate that Level 1, 17 the only person that can remove an 18 inmate from Level 1 to a different level 19 is a psychiatrist? 20 A. Correct. 21 MR. NINOSKY: Object to the 22 form. 23 BY MR. MINCEY: 24 Q. Let me move to -- Ms. Betancourt, 25 I'm showing you what is marked as PCM35.</p>

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12 (Pages 42 to 45)

<p style="text-align: right;">Page 42</p> <p>1 Do you recognize this form?</p> <p>2 A. Yes.</p> <p>3 Q. And this says this is an Education</p> <p>4 Acknowledgment Form, correct?</p> <p>5 A. Yes.</p> <p>6 Q. And is this something that you</p> <p>7 provide to the inmate for them to read</p> <p>8 on their own?</p> <p>9 A. We go over it with them, and then</p> <p>10 we have them initial and sign it. But I</p> <p>11 didn't get to that point with him, so</p> <p>12 that's why there's no initials or</p> <p>13 signature.</p> <p>14 Q. Did you read the form verbatim to</p> <p>15 him?</p> <p>16 A. We don't read it verbatim, but we</p> <p>17 go over the basic protocols, mental</p> <p>18 health, things like that.</p> <p>19 Q. Did you attempt to go over this</p> <p>20 form with Mr. Riley?</p> <p>21 A. I don't remember.</p> <p>22 Q. Is there a reason why you wouldn't</p> <p>23 try to go over this form with Mr.</p> <p>24 Riley?</p> <p>25 MR. NINOSKY: Object to the</p>	<p style="text-align: right;">Page 44</p> <p>1 You can answer.</p> <p>2 THE WITNESS: Until the</p> <p>3 intake -- that's part of the</p> <p>4 intake, so until the intake is</p> <p>5 completed.</p> <p>6 BY MR. MINCEY:</p> <p>7 Q. Okay. I gotcha.</p> <p>8 And I apologize if I asked you, you</p> <p>9 did not attempt to go through this form</p> <p>10 with Mr. Riley, correct?</p> <p>11 MR. NINOSKY: Object to the</p> <p>12 form. Asked and answered.</p> <p>13 You can answer it again.</p> <p>14 THE WITNESS: I don't</p> <p>15 remember.</p> <p>16 BY MR. MINCEY:</p> <p>17 Q. Do you recall at what point during</p> <p>18 the intake you determined that Mr. Riley</p> <p>19 was unable to complete the intake</p> <p>20 process?</p> <p>21 A. When I stopped asking him the</p> <p>22 questions is when I realized he couldn't</p> <p>23 complete the intake.</p> <p>24 Q. When you stopped asking him the</p> <p>25 questions?</p>
<p style="text-align: right;">Page 43</p> <p>1 form.</p> <p>2 THE WITNESS: I don't</p> <p>3 remember.</p> <p>4 BY MR. MINCEY:</p> <p>5 Q. Is it part of the protocol to go</p> <p>6 over this form with every inmate that</p> <p>7 comes to the Dauphin County Prison?</p> <p>8 A. Yes.</p> <p>9 Q. If you are unable to complete this</p> <p>10 form with an inmate, is there some type</p> <p>11 of notation you are required to make?</p> <p>12 A. The charge nurse, we inform the</p> <p>13 charge nurse. She's the one that does</p> <p>14 the next steps.</p> <p>15 Q. And when you inform the charge</p> <p>16 nurse, is that noted somewhere in the</p> <p>17 records?</p> <p>18 A. It should be. It would be -- they</p> <p>19 would place tasks to see him again every</p> <p>20 shift.</p> <p>21 Q. Okay. The task would be to see him</p> <p>22 every shift until this form was</p> <p>23 completed?</p> <p>24 MR. NINOSKY: Object to the</p> <p>25 form.</p>	<p style="text-align: right;">Page 45</p> <p>1 A. On the Influenza Form, I didn't</p> <p>2 proceed any further because at that</p> <p>3 point, I knew he couldn't. He wasn't</p> <p>4 answering the questions.</p> <p>5 Q. So, we're back on PCM15 and 16. It</p> <p>6 looks like you answered he was oriented</p> <p>7 to person, place and time, correct?</p> <p>8 A. Yup. Yes.</p> <p>9 Q. And then the next part is your</p> <p>10 assessment, right?</p> <p>11 A. Yes.</p> <p>12 Q. You're not asking him any questions</p> <p>13 in that part, right?</p> <p>14 A. No.</p> <p>15 Q. Then the next part is a plan,</p> <p>16 right?</p> <p>17 A. Yes.</p> <p>18 Q. You're not asking him any questions</p> <p>19 in that part, right?</p> <p>20 A. No.</p> <p>21 Q. Okay. So, at what point was it</p> <p>22 that Mr. Riley stopped answering your</p> <p>23 questions on the Influenza Form?</p> <p>24 A. I don't remember.</p> <p>25 Q. And after you did the Influenza</p>

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13 (Pages 46 to 49)

<p style="text-align: right;">Page 46</p> <p>1 Form, then it is the suicide precautions 2 for him, correct? 3 A. I don't remember the order of the 4 forms. 5 Q. How many forms are involved in the 6 intake process; do you remember that? 7 A. There's a lot, but I don't remember 8 the exact amount. 9 Q. Ms. Betancourt, we are looking at 10 what has been marked as PCM48. Do you 11 recognize this form? 12 A. Yes. 13 Q. Okay. It says it's a "DCP Medical 14 Incident and Injury Report?" 15 A. Yes. 16 Q. It has you as the Interviewer up 17 top here, right? 18 A. Yes. 19 Q. It says, "Describe the nature or 20 complaint of injury." Is this you 21 entering "Inmate was trying to break 22 through handcuffs causing injury to his 23 right wrist?" 24 A. Yes. 25 Q. Did you actually observe that?</p>	<p style="text-align: right;">Page 48</p> <p>1 you this: How did he stop trying to, as 2 you said, break his hands from the 3 handcuffs? 4 A. I don't remember, but I do know he 5 did let me clean him up and bandage 6 him. 7 Q. When you saw him trying to break 8 the handcuffs, did you do anything to 9 try and stop him? 10 MR. NINOSKY: Object to the 11 form. 12 THE WITNESS: No. That's 13 not my job. 14 BY MR. MINCEY: 15 Q. Did you see the officers trying to 16 do anything to stop him? 17 A. Yes. 18 Q. And what did you see the officers 19 doing? 20 A. They were just telling him to don't 21 do that. 22 Q. Other than telling him not to do 23 that, did any of the officers make 24 physical contact with Mr. Riley? 25 A. No.</p>
<p style="text-align: right;">Page 47</p> <p>1 A. Yes. 2 Q. Okay. Can you describe for me what 3 you saw? 4 A. He was just -- he was just trying 5 to break through the handcuffs. He was 6 upset. He was angry. 7 Q. When you say he was trying to break 8 through the handcuffs, what did you see 9 him doing? 10 A. Trying to separate his hands from 11 the handcuffs causing injuries to his 12 forearms. 13 Q. Where was he when this happened? 14 A. In the medical room. 15 Q. Was he sitting or standing? 16 A. He was sitting. 17 Q. Was there anybody else in the 18 medical office with you when this 19 happened? 20 A. Officers. 21 Q. Do you remember who? 22 A. I do not. 23 Q. Do you remember how many? 24 A. There was a couple. 25 Q. What, if anything -- or let me ask</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. After the officers told Mr. Riley 2 to stop trying to break the cuffs, did 3 he stop? 4 A. He stopped. 5 Q. If you can approximate for me, how 6 long did you see him trying to break his 7 hands from the handcuffs? 8 A. I'm not sure how long. I just know 9 he was very strong. He had like some 10 type of strength. He was strong. 11 Q. You said he allowed you to clean 12 his wrists? 13 A. Yes. 14 Q. And while you were cleaning his 15 wrists, are you asking him any 16 questions? 17 A. I don't remember. 18 Q. Do you remember if Mr. Riley was 19 speaking to you at all during this? 20 A. I don't remember. 21 Q. When you saw Mr. Riley trying to 22 break his hands from the handcuffs, was 23 he saying anything? 24 A. I don't remember. 25 Q. You say here, "Inmate tolerated it</p>

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14 (Pages 50 to 53)

<p style="text-align: right;">Page 50</p> <p>1 well, "it" meaning the fact that you 2 cleaned his wrist with saline. What led 3 you to believe that he tolerated it 4 well? 5 A. He was calm with me. He wasn't -- 6 he never -- he never was hostile or 7 anything around me. He let me do 8 things, touch him and take his vitals 9 and stuff like that. 10 Q. During your intake of Mr. Riley, 11 did you observe him refusing any type of 12 treatment? 13 MR. NINOSKY: Object to the 14 form. 15 But you can answer. 16 THE WITNESS: I don't 17 remember. 18 BY MR. MINCEY: 19 Q. I'm showing you, Ms. Betancourt, 20 what has been marked as PCM57. This is 21 a Prime Care medical form, "Notification 22 of Medical Services." Is this your 23 signature here at the bottom? 24 A. Yes. 25 Q. Okay. And the patient signature is</p>	<p style="text-align: right;">Page 52</p> <p>1 A. Correct. 2 Q. You don't remember at what point 3 during intake that you stopped, 4 correct? 5 A. I don't remember. Very early on. 6 Q. Ms. Betancourt, I'm showing you 7 what is marked as PCM63, and up here it 8 says, "Tyrique Riley problems." Down 9 here at 10:21, you wrote, "Inmate 10 refused to complete intake." Are these 11 your words? 12 A. Correct. 13 Q. And then it says, "Refused to sign 14 Refusal Form," and that's at 8:40 p.m. 15 A. No. 16 Q. Do you see this? 17 A. I don't remember that. 18 Q. Do you remember what shift you were 19 working on June 18th, 2019? 20 A. I only worked first shift. 21 Q. What time period -- 22 A. I did not work the evenings. 23 Q. What time period covers first 24 shift? 25 A. 6:00 to 2:30 and then --</p>
<p style="text-align: right;">Page 51</p> <p>1 blank? 2 A. Yes. 3 Q. Is this one of the forms you're 4 required to go over with every inmate 5 that comes in the Dauphin County 6 Prison? 7 A. Yes. 8 Q. And when you go over that form with 9 them, are you reading it to them, or are 10 you handing it to them? 11 A. We go over it. I don't read it to 12 them. I basically sum up what the form 13 says. If they have further questions, I 14 will help them. 15 Q. And did you do that with Mr. Riley? 16 A. We didn't get that far. That's at 17 the very end of the intake. Like, when 18 I do an intake, I always get all my 19 stuff ready. I do my signature, date 20 all my paperwork. That's why my name 21 and everything is on there, but that's 22 the very last thing we do in intake. 23 Q. Did you say before you got to this 24 part of the intake packet, you had 25 already stopped the intake, correct?</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. 6:00 a.m. to 2:30 p.m.? 2 A. Yes. And then I worked -- Sundays 3 I worked till 6:30 in the evening. 4 Q. On like overtime or something like 5 that? 6 A. No. I just had a different 7 schedule. 8 Q. Okay. 9 MR. NINOSKY: Kevin, you 10 haven't taken any depositions 11 yet, so you don't really know how 12 the charting works with the 13 electronic medical record. 14 That's not an entry that she 15 would've made. That's kind of a 16 compilation of other entries. If 17 you would look at the chart 18 notes, you would see that that 19 particular entry was made by 20 another medical assistant later 21 that day. 22 MR. MINCEY: Okay. All 23 right. 24 BY MR. MINCEY: 25 Q. So, Ms. Betancourt, you didn't</p>

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15 (Pages 54 to 57)

<p style="text-align: right;">Page 54</p> <p>1 write "Inmate refused to complete 2 intake" then? 3 A. No. 4 Q. Okay. What about this right here, 5 "PPD was successfully planted in LFA?" 6 Did you write that? 7 A. I'm not used to that form. I don't 8 recall anything with that form, so I 9 don't -- 10 MR. NINOSKY: Kevin, I 11 would suggest -- if you pulled up 12 PCM25, which is a portion of the 13 chart notes, and I'm just showing 14 the witness PCM25, the paper 15 version, she might be able to 16 answer your question. 17 So, looking at PCM25, can 18 you answer counsel's question as 19 to what you would have entered? 20 THE WITNESS: Can you 21 repeat the question again? 22 BY MR. MINCEY: 23 Q. Did you enter this, where it says, 24 "PPD was successfully planted in LFA?" 25 A. On 6/18, 2019, yes, I did.</p>	<p style="text-align: right;">Page 56</p> <p>1 finish intake due to inmate refusal," 2 correct -- 3 A. Yes. 4 Q. And is there a reason why you 5 classified it as Mr. Riley was refusing 6 to complete intake versus him being 7 unable to complete it? 8 MR. NINOSKY: Object to the 9 form. 10 But you can answer. 11 BY MR. MINCEY: 12 Q. Do you want me to ask it a 13 different way, Ms. Betancourt? 14 A. No. I understand. 15 So, we do that with anyone. So, 16 basically if we don't complete an 17 intake, that's just what we write, 18 "inmate refused." So, if I couldn't 19 complete an intake because he couldn't 20 answer questions, it would be considered 21 a refusal. 22 Q. No matter what the situation -- 23 A. No matter what the situation is. 24 Q. After your attempt at completing 25 intake on June the 18th, did you ever</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. Okay. And am I correct that LFA 2 means left forearm? 3 A. Yes. 4 Q. Okay. And what does BS mean? 5 A. Blood sugar. 6 Q. And then you wrote, "Intake needs 7 completed," correct? 8 A. Correct. Well, I didn't write 9 that. That's just a population, like an 10 autopopulate. I didn't write it. 11 Q. So, this part here, "to finish 12 intake due to inmate refusing," is also 13 autopopulated? 14 A. Yes. 15 Q. The "unable to finish intake due to 16 inmate refusing," was that typed by you, 17 or was autopopulated? 18 A. That's typed by me. This is 19 autopopulated (indicating). 20 MR. NINOSKY: Intake 21 review, intake means completed 22 by -- 23 THE WITNESS: Yes. Yes. 24 BY MR. MINCEY: 25 Q. Okay. So, you typed "unable to</p>	<p style="text-align: right;">Page 57</p> <p>1 see Mr. Riley again? 2 A. No, I did not. 3 Q. Do you perform detox checks as 4 part of your job as a medical 5 assistant? 6 A. Yes. 7 Q. Did you perform any detox checks 8 for Mr. Riley? 9 A. No, I did not. 10 Q. Stop sharing real quick. 11 I'm showing you what is marked as 12 PCM203, and it has appointment schedule 13 dates 6/22, 2019. And it has "Refused 14 appointment," and then it has "Changed 15 note by Cassandra Betancourt." Do you 16 see this? 17 A. I see it. 18 Q. And this is for detox checks; do 19 you see this? 20 A. I see it. That stuff autopopulates 21 because I was the one who initiated the 22 intake. That's why my name is on 23 everything. 24 MR. NINOSKY: Explain that 25 to counsel.</p>

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16 (Pages 58 to 61)

<p style="text-align: right;">Page 58</p> <p>1 THE WITNESS: So, I didn't 2 do that. So, whenever you do an 3 intake, your name is 4 automatically -- because I was 5 the one who initiated the intake, 6 my name automatically stays 7 there. 8 BY MR. MINCEY: 9 Q. Okay. And when a note is changed -- 10 like right here, it says "Change note 11 date 6/22, 2019." Was this not actually 12 changed by you? 13 A. I don't remember. 12:00 a.m., I 14 wouldn't be there at 12:00 a.m. This is 15 autopopulated. 16 Q. It says "Last modified date and 17 time, 6/22, 9:34 a.m.;" do you see 18 that? 19 A. I see it. 20 Q. Is that during what normally would 21 be your shift? 22 A. That would normally be my shift. 23 I'm not used to this type of form so I 24 don't -- 25 MR. NINOSKY: You can tell</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. Okay. Yes. 2 A. I would be with an officer. 3 Q. Okay. With a correctional 4 officer? 5 A. Correct. 6 Q. Okay. And if an inmate refuses to 7 do a detox check, are you required to 8 note that somewhere? 9 A. Yes. 10 Q. And where would you note that? 11 A. On the chart notes. 12 Q. On the chart notes. Is there any 13 other form that you would fill out? 14 A. Not that I remember. 15 Q. Ms. Betancourt, I know you have a 16 hard copy in front of you. I'm going to 17 put it on the screen, too. PCM, Pages 18 65 to 75, do you see this on the 19 screen? 20 A. Yes. 21 Q. And this says, "Refusal to consent 22 to treatment?" 23 A. Yes. 24 Q. Okay. And this one in particular, 25 even though it's not completed by you,</p>
<p style="text-align: right;">Page 59</p> <p>1 him that. That's not a form you 2 generally see. You can explain 3 that to him. 4 THE WITNESS: Yeah. That's 5 not a form I deal with. That 6 probably is a form that the 7 charge nurse, the registered 8 nurse, Stephanie, she had to be 9 the one doing that stuff. My 10 name just populates because I was 11 the one who initiated the intake. 12 BY MR. MINCEY: 13 Q. Okay. And generally speaking, when 14 a detox check is performed, is there a 15 form that needs to be filled out? 16 A. Yes. 17 Q. Okay. And is there a particular 18 number of times a day that a detox check 19 will be performed on an inmate? 20 A. Once every shift. 21 Q. And when a person performs a detox 22 check, are they alone, or are they with 23 other people? 24 A. You mean when I would perform a 25 detox check, would I be alone?</p>	<p style="text-align: right;">Page 61</p> <p>1 it's for a detox check, right? 2 A. It's for intake and a detox check. 3 Q. Okay. And is this the type of form 4 you would fill out if somebody refused 5 to do a detox check? 6 A. Yes. 7 Q. And it's your testimony that you 8 did not perform any such detox checks on 9 Mr. Riley? 10 A. No. I never saw Riley after the 11 intake. I probably attempted to do a 12 detox check, but he was not brought down 13 to medical by security. 14 Q. When they do a detox check, is that 15 only done in the medical office? 16 A. Yes. At that time, yes. 17 Q. Did that policy change at some 18 point in time? 19 A. When COVID hit, yes. 20 Q. Okay. And when COVID came, would 21 you go to, like, the cell and do detox 22 checks there? 23 A. Yes. 24 Q. Okay. Bear with me, Ms. 25 Betancourt. I'm scrolling. Now, they</p>

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17 (Pages 62 to 65)

<p style="text-align: right;">Page 62</p> <p>1 gave me a lot of documents in this 2 packet, so I'm scrolling down to -- 3 A. You're fine. 4 Q. I do appreciate it, but it's a lot 5 of paper to go through. 6 Ms. Betancourt, I'm showing you 7 what's marked as PCM318, and these look 8 like chart notes. Do you see what I'm 9 talking about? 10 A. Yes. 11 Q. Okay. This one at the top here, it 12 looks like one we were just talking 13 about, "PPD successfully planted in left 14 forearm," right? 15 A. Yes. 16 Q. And then the next one -- when it 17 says, "Note by," this you entering your 18 name before you enter a note? 19 A. We don't enter our names. We just 20 log into the system. 21 Q. Okay. So, you log in, and then you 22 enter a note? 23 A. Yes. 24 Q. And when your name is here, that 25 means you're the one that logged into</p>	<p style="text-align: right;">Page 64</p> <p>1 MR. NINOSKY: I know. I'm 2 screwing up this deposition. 3 You'd be done already by now. 4 She's going to look 5 through 65 to 75, because I'm 6 presuming you're looking for 7 anything that she would have 8 completed, correct? 9 MR. MINCEY: Correct. 10 THE WITNESS: No. 11 BY MR. MINCEY: 12 Q. When you say "no," is that no you 13 didn't see any form completed by you? 14 A. Correct. 15 Q. Is there a reason why you would not 16 complete a refusal to consent for 17 treatment as required? 18 A. I always -- 19 MR. NINOSKY: Object to 20 form. 21 THE WITNESS: I always 22 complete those forms. It could 23 have not got scanned. It could 24 have somehow not got scanned, 25 because that does happen.</p>
<p style="text-align: right;">Page 63</p> <p>1 the terminal, correct? 2 A. Yes. 3 Q. Do you see right here (indicating)? 4 A. Yes. 5 Q. It says, "6/22, 9:34 a.m., inmate 6 refused detox check, refused to sign 7 refusal form?" 8 A. Yes. 9 Q. Okay. Does that mean that you 10 logged in and entered this into the 11 chart notes? 12 A. Yes. 13 Q. And if you conducted the detox 14 check or tried to conduct the detox 15 check, but he refused, you would have 16 filled out one of these forms we just 17 looked at between 65 and 75, right? 18 A. Yes. 19 Q. Okay. Do you have Pages 65 to 75 20 in front of you? 21 MR. NINOSKY: One second. 22 I'll get there. 23 MR. MINCEY: It's your 24 fault, John. 25 (Laughter.)</p>	<p style="text-align: right;">Page 65</p> <p>1 BY MR. MINCEY: 2 Q. When you say that it could have not 3 gotten scanned, you're just guessing at 4 that point, right? 5 MR. NINOSKY: Object to the 6 form. 7 But you can answer. 8 THE WITNESS: Yes. 9 BY MR. MINCEY: 10 Q. How can you be sure that you 11 completed the form? 12 A. Because that's part of what we do 13 when they refuse an intake. That's a 14 form that we do, and those forms, when 15 we're done completing them, we put them 16 in a pile. The pile could be this high 17 (indicating), and then they get scanned 18 individually, so sometimes they can get 19 missed. 20 Q. Seeing this in the chart notes -- 21 I'm back on PCM318. Does seeing this in 22 the chart notes refresh your 23 recollection as to performing a detox 24 check for Mr. Riley? 25 MR. NINOSKY: Object to the</p>

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18 (Pages 66 to 69)

<p style="text-align: right;">Page 66</p> <p>1 form. She didn't do the detox 2 check. It was refused. 3 BY MR. MINCEY: 4 Q. Does this refresh your recollection 5 to attempting to do a detox check on Mr. 6 Riley and him refusing? 7 A. So, at that time, we didn't go to 8 the cell directly, so I never saw Riley 9 directly. I would give a list to the 10 officer. He will call the block. Those 11 officers would tell if those inmates are 12 coming down or not. Then I'm told by 13 the medical officer that he refused. 14 Q. So, when you write that he refused 15 detox check and refused to sign a 16 refusal form, that is you getting 17 information from another person, 18 correct? 19 A. Correct. 20 Q. Do you recall who it was that told 21 you this? 22 A. I do not. 23 Q. Do those officers that are on the 24 block have these refusal forms with 25 them?</p>	<p style="text-align: right;">Page 68</p> <p>1 8:42 a.m. Is that during what would 2 normally be your shift? 3 A. Yes. 4 Q. And because your name is logged in, 5 I'll ask you the same question. Does 6 this mean you typed these words into the 7 chart notes, "IN Refused detox check and 8 refused to sign refusal form?" 9 A. Yes. 10 Q. Did you actually go to Mr. Riley's 11 cell to get him to sign the refusal 12 form? 13 A. I don't remember. 14 Q. Is this another situation where 15 somebody told you that Mr. Riley refused 16 the detox check? 17 A. I don't even remember. I don't 18 remember the dates. 19 Q. And when you looked through Pages 20 65 to 75, am I correct that you did not 21 see a refusal of treatment form for 22 either June 22nd or June 25th, 2019? 23 A. Correct. 24 Q. Is it your testimony that you did 25 not actually see Mr. Riley on June 25th?</p>
<p style="text-align: right;">Page 67</p> <p>1 A. No. We have them. 2 Q. So, when an inmate refuses the 3 detox check and you're informed that 4 they refused it, do you then go down to 5 the cell and get the inmate to sign the 6 form? 7 A. Depending on if we're allowed to go 8 to his cell or not. We just don't go to 9 the cell. Security has to give us 10 permission to go to the cell. 11 Q. Did you ask for permission to go to 12 the cell? 13 A. I don't remember you. 14 Q. You write "Refused to sign the 15 refusal form." Does that mean that you 16 actually tried to get him to sign the 17 form, and he actively refused? 18 A. I don't remember. 19 Q. I'm on PCM319. Do you see your 20 name here (indicating), Ms. Betancourt? 21 A. Yes. 22 Q. Do you see your name here -- 23 A. Yes, I do. 24 Q. -- on PCM319. 25 And this is for June 25th, 2019 at</p>	<p style="text-align: right;">Page 69</p> <p>1 A. No, I didn't see him. 2 Q. As the medical assistant, is it 3 important for you to be able to see the 4 inmates to notice whether or not there 5 could be a change in their condition? 6 MR. NINOSKY: Object to the 7 form as to important. 8 But you can answer. 9 THE WITNESS: Yes, it's 10 important. 11 BY MR. MINCEY: 12 Q. Am I correct that your only 13 opportunity to observe Mr. Riley would 14 have been during these detox checks? 15 MR. NINOSKY: Object to the 16 form. 17 But you can answer. 18 THE WITNESS: Yes. 19 BY MR. MINCEY: 20 Q. And if Mr. Riley's condition had 21 worsened or deteriorated, you would not 22 have known because you did not see him, 23 correct? 24 MR. NINOSKY: Object to the 25 form. Speculation.</p>

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19 (Pages 70 to 73)

<p style="text-align: right;">Page 70</p> <p>1 But you can answer. 2 THE WITNESS: Right. 3 MR. MINCEY: Counsel, can 4 we take, maybe, like a five, 5 ten-minute break real quick? I 6 think I'm actually almost done. 7 MR. NINOSKY: Sure. 8 Whatever. Ten minutes sounds 9 like a winner. 10 MR. MINCEY: I appreciate 11 it. All right, guys. 12 --- 13 (A brief recess was taken 14 at this time.) 15 --- 16 BY MR. MINCEY: 17 Q. Ms. Betancourt, I know earlier I 18 asked you if you had reviewed any 19 documents, and you said that you had 20 not. Were you asked to search for any 21 documents in preparation for your 22 deposition today? 23 A. Did we go over documents? Is that 24 what you're trying to ask me? 25 Q. Were you asked to look for any?</p>	<p style="text-align: right;">Page 72</p> <p>1 We're assigned specific blocks. 2 Q. Okay. And the block -- at this 3 time, June 18, 2019, the block that you 4 were assigned to was the one that Mr. 5 Riley was on? 6 A. June 18th, was that the day he was 7 brought to the Judicial Center? 8 Q. Yeah, June 18th, 2019. 9 A. I was assigned to the Judicial 10 Center. 11 Q. Okay. And in the days after that, 12 were you also assigned to the Judicial 13 Center, or were you assigned to other 14 areas of the jail? 15 A. I don't recall the other days. I 16 can't remember where. 17 Q. So, when I was showing you the 18 chart notes for June 22nd, for example, 19 would that have been when you were 20 assigned to the Judicial Center when you 21 were supposed to be doing the detox 22 checks on Mr. Riley? 23 A. No. We were assigned the Judicial 24 Center, and, like, blocks that don't 25 require a lot for us to do. So, you get</p>
<p style="text-align: right;">Page 71</p> <p>1 A. No, I wasn't asked to look for any 2 documents. 3 Q. Okay. And I asked you earlier 4 whether or not you had faced any 5 discipline while you were a medical 6 assistant. I neglected to ask you have 7 there ever been any complaints made 8 against you for your work as a medical 9 assistant? 10 A. No. Not that I recall. 11 Q. When you are working as an MA at 12 Dauphin County Prison, were you 13 responsible for -- I guess as an MA, are 14 you responsible for all of the inmates 15 in the prison, or are you working in a 16 specific area of the prison or block on 17 the prison? Do you understand my 18 question? It's a little choppy. 19 MR. NINOSKY: Object to the 20 form. 21 But you can answer if you 22 understand it. 23 BY MR. MINCEY: 24 Q. It was real choppy. Sorry. 25 A. No. I understand.</p>	<p style="text-align: right;">Page 73</p> <p>1 what I'm saying? So, the higher amount 2 of work blocks is assigned to the other 3 MA. If you're signed to the Judicial 4 Center, you don't get a lot of the 5 assignments because you have to 6 constantly run down there. 7 Q. And on June 22nd, for example, 8 when Mr. Riley is on Level 1, suicide 9 watch, what part of the prison would he 10 be in? 11 A. A Block. 12 Q. And A Block on June 22nd, would 13 that have been an area that you were 14 responsible for? 15 MR. NINOSKY: Asked and 16 answered. 17 You can answer it again. 18 THE WITNESS: I don't 19 remember. I mean, if I -- I'm 20 going to say yes because I don't 21 remember, but if I documented 22 that he was refused, then I would 23 be assigned to that block. 24 BY MR. MINCEY: 25 Q. And when you come on the shift, do</p>

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20 (Pages 74 to 77)

<p style="text-align: right;">Page 74</p> <p>1 you review the notes of the people on 2 your block to see if there had been any 3 changes in their condition? 4 MR. NINOSKY: Object to the 5 form. 6 But you can answer. 7 THE WITNESS: No. The 8 nurses do that. 9 BY MR. MINCEY: 10 Q. Okay. When you come on your shift 11 on June 22nd, for example, do you have 12 access to the other refusal -- detox 13 check refusal forms that have been 14 completed on behalf of Mr. Riley? 15 A. No. I don't have access to that. 16 Q. Those are handwritten forms, 17 correct? 18 A. They're handwritten forms that get 19 scanned into his chart later on. 20 Q. When you say "later on," are they 21 scanned into the chart later on that day 22 after they're collected or -- 23 A. It could be that day. It could be 24 on the next day. It all depends on when 25 we get to it.</p>	<p style="text-align: right;">Page 76</p> <p>1 MR. NINOSKY: Object to the 2 form. 3 You can answer. 4 THE WITNESS: Not that I 5 deal with, no. 6 BY MR. MINCEY: 7 Q. Okay. Does that mean there is a 8 protocol in place? 9 A. I don't remember. I think after so 10 many, then, like, the doctors and stuff 11 get involved. 12 Q. Do you know how many? 13 A. I don't remember. 14 Q. And is there a protocol in place 15 that directs you how to respond to an 16 inmate that is repeatedly refusing to 17 complete the intake? 18 A. We just continuously do it every 19 shift until we can get an intake 20 completed. 21 Q. And if an inmate repeatedly refuses 22 to complete the intake, do they just 23 remain on Level 1, suicide watch? 24 A. Yes. 25 Q. And they remain there until they're</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. If you needed to see the history of 2 an inmate, do you have access to that? 3 A. Yes. 4 Q. Okay. And where would that be 5 kept? 6 A. In his medical chart. 7 Q. And is it your testimony that when 8 you started your shift on June 22nd, you 9 did not review the medical chart for Mr. 10 Riley? 11 MR. NINOSKY: Object to the 12 form. 13 You can answer. 14 THE WITNESS: I'm not the 15 nurse in -- that's the charge 16 nurse that does that. I just do 17 my assignments. If it's detox 18 checks, that type of stuff, those 19 type of things you're talking 20 about are for like the registered 21 nurses and the LPNs. 22 BY MR. MINCEY: 23 Q. Is there any type protocol in place 24 for how you handle an individual that is 25 repeatedly refusing detox checks?</p>	<p style="text-align: right;">Page 77</p> <p>1 released or sentenced? 2 A. Correct. 3 Q. Are there any efforts taken to -- 4 let me ask you this way. Are there any 5 additional efforts taken to complete the 6 intake process for a person that has 7 repeatedly refused to complete intake? 8 MR. NINOSKY: Object to the 9 form. 10 But you can answer. 11 THE WITNESS: In a 24-hour 12 timeframe, we do it once every 13 shift, so we would attempt it 14 three times a day. 15 BY MR. MINCEY: 16 Q. And when you're attempting to go 17 complete intake, what does that mean? 18 What does that consist of? 19 A. Bring him down to medical and sit 20 him down, and asking him the intake 21 questions. 22 Q. And if that person refuses to 23 answer the intake or is unable to answer 24 the intake questions, you just send them 25 back?</p>

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21 (Pages 78 to 81)

Page 78	Page 80
<p>1 A. Yes. 2 Q. To Level 1? 3 A. To Level 1. They remain on their 4 status. 5 Q. Do all inmates have to go through a 6 detox check? 7 A. No. 8 Q. Is it common to continue with a 9 detox check for an individual that has 10 been determined not to have a substance 11 abuse issue? 12 MR. NINOSKY: Object to the 13 form. 14 You can answer if you have 15 an understanding. 16 THE WITNESS: Yeah. You 17 have to clarify that question. 18 BY MR. MINCEY: 19 Q. If a doctor made the determination 20 that Mr. Riley was not suffering from a 21 substance abuse issue on June 20th, 22 would it be out of the ordinary for 23 that inmate to have a detox check after 24 that? 25 MR. NINOSKY: Object to the</p>	<p>1 couple questions if you don't 2 mind. 3 MR. NINOSKY: Go ahead. 4 MR. POLAHA: Thank you. 5 --- 6 EXAMINATION 7 --- 8 BY MR. POLAHA: 9 Q. Good morning, Ms. Betancourt. My 10 name is Matt Polaha along with David 11 MacMain. We represent the Susquehanna 12 Township police officers involved in 13 this case. I just have a couple of 14 follow-up questions. 15 Just to kind of recap with some 16 foundation, you previously testified 17 that you attempted to perform an intake 18 on Tyrique Riley. When was the first 19 time you tried to perform the intake 20 questions on Tyrique? 21 A. Can I look at the document so I can 22 get the correct date? 23 Q. Was it June 18th? 24 A. Yes. When he was brought to the 25 Judicial Center.</p>
Page 79	Page 81
<p>1 form. 2 But you can answer if you 3 know. 4 THE WITNESS: Yeah. I 5 don't know. That would be 6 something that a nurse or LPN 7 would answer. 8 BY MR. MINCEY: 9 Q. You don't have any control over 10 whether or not someone has a detox 11 check? You just do what is listed for 12 you to do? 13 A. Correct. 14 Q. All right. 15 MR. MINCEY: Ms. 16 Betancourt, I don't think I have 17 any additional questions for you, 18 but the other attorneys on the 19 line may. And, so, I'm going to 20 give them an opportunity to ask 21 you questions if they have any. 22 MR. LAVERY: Frank Lavery. 23 I have no questions for the 24 witness. 25 MR. POLAHA: I have a</p>	<p>1 Q. Do you recall what time of day that 2 was? 3 A. It was the morning. 4 Q. Okay. And you had previously 5 testified that if someone had a 6 condition or injury that required them 7 to go to the hospital, you would report 8 that condition to the charge nurse, who 9 then makes the decision on whether or 10 not that person should go to the 11 hospital; is that correct? 12 A. Yes. 13 Q. And, so, when you first did intake 14 or attempted to perform intake on 15 Tyrique Riley on June 18th, 2019, did he 16 present with any injuries or condition 17 that you reported to the charge nurse to 18 obtain approval for him to go to the 19 hospital? 20 A. No. He did not have any injuries 21 or a condition that I noticed. 22 Q. Thank you. 23 MR. POLAHA: I have no more 24 questions. 25 THE WITNESS: You're</p>

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